

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

)	
FERRING PHARMACEUTICALS INC.,)	
)	
Plaintiff)	
)	
v.)	Civil Action No. 13-cv-12553
)	
BRAINTREE LABORATORIES, INC.,)	
)	
Defendant)	
)	

MOTION FOR ENTRY OF A PROTECTIVE ORDER

Plaintiff Ferring Pharmaceuticals Inc., ("Ferring") respectfully moves this Court to enter the Protective Order attached at Exhibit A. In support of this Motion, Ferring states:

- 1) On January 22, 2015, a hearing was held regarding the parties' Joint Motion for a Protective Order. (Doc. 115). As stated in open court, and confirmed in the Court's electronic order of January 23, 2015, the motion was granted in part and denied in part.
- 2) The Protective Order attached at Exhibit A, amends Exhibit 1 to the Joint Motion (Doc. 115-1). As instructed by the Court, the Protective Order includes the following amendments: Paragraph 7(a) includes the shaded language; the third line of Paragraph 8 includes the shaded language trial counsel as opposed to counsel for receiving party; and the shaded portion in the second to last sentence of Paragraph 8 is omitted. The Protective Order was also amended to delete any reference that it is being entered as a "stipulation".
- 3) The Protective Order attached at Exhibit A also removes any reference that it is agreed or stipulated.

4) Braintree's counsel represented that Braintree agrees that the version attached hereto accurately reflects the Court's January 22, 2015 Order.

WHEREFORE, Ferring respectfully requests that the Court enter the Protective Order attached at Exhibit A.

Dated: January 27, 2015

Respectfully submitted,

FERRING PHARMACEUTICALS INC.

By its attorneys,

OLSON & CEPURITIS, LTD.

/s/Arne M. Olson

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the NEF on January 27, 2015:

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